

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:18-cv-00586-RJC-DSC

JANE DOE,)
)
Plaintiff,)
)
v.)
)
CHARLOTTE MECKLENBURG BOARD OF)
EDUCATION,)
)
Defendants.)
_____)

VERDICT FORM

1. Has Plaintiff Jane Doe proved that Myers Park High School, a CMS school, was an educational institution receiving federal funds? The parties stipulated to this fact, so select “Yes” and proceed to Question 2.

YES Yes No

2. Has Plaintiff Jane Doe proved that she suffered sexual harassment?

Yes Yes No

If your answer to this Question is “Yes,” proceed to Question 3

If your answer to this Question is “No,” your deliberations are complete and your Foreperson should sign and date this verdict form and notify the Court that you have reached a verdict.

3. Has Jane Doe proved that the sexual harassment was so severe, pervasive, and objectively offensive that it deprived her of equal access to the educational opportunities or benefits provided by CMS?

Yes Yes No

If your answer to this Question is “Yes,” proceed to Question 4

If your answer to this Question is “No,” your deliberations are complete and your Foreperson should sign and date this verdict form and notify the Court that you have reached a verdict.

4. Has Plaintiff Jane Doe proved that CMS had actual notice of Doe’s harassment?

Yes Yes No

If your answer to this Question is “Yes,” proceed to Question 5

If your answer to this Question is “No,” your deliberations are complete and your Foreperson should sign and date this verdict form and notify the Court that you have reached a verdict.

5. Has Plaintiff Jane Doe proved that CMS acted with deliberate indifference?

Yes No No

If you answered yes to Question 5, did CMS act with deliberate indifference in responding to Doe’s report of sexual harassment?

Yes No

If you answered yes to Question 5, did CMS act with deliberate indifference by maintaining a policy of deliberate indifference to known reports of sexual harassment?

Yes No

If your answer to this Question is “Yes,” proceed to Question 6

If your answer to this Question is “No,” your deliberations are complete and your Foreperson should sign and date this verdict form and notify the Court that you have reached a verdict.

6. Should Plaintiff Jane Doe be awarded compensatory or nominal damages against CMS?

Yes No

If your answer is “Yes,” in what amount?

\$ _____

Signed, this 20 day of January, 2023.



Foreperson
